

1 THE HONORABLE RICHARD A. JONES  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

9 STEVE TEIXEIRA,  
10  
11 Plaintiff,  
12 v.  
13 MOZILLA CORPORATION a.k.a. M.F.  
14 Technologies, a California corporation;  
15 MOZILLA FOUNDATION, a California  
16 public benefit corporation; LAURA  
17 CHAMBERS and her marital community;  
18 WINIFRED MITCHELL BAKER and her  
19 marital community, and DANI CHEHAK and  
20 her marital community,  
21 Defendants.

Case No.: 2:24-CV-01032-RAJ

[PROPOSED] ORDER GRANTING  
PLAINTIFF'S SECOND MOTION TO  
COMPEL

22 THIS MATTER came before the Court on Plaintiff's Second Motion to Compel. This  
23 Court has considered the records and files in this proceeding, including the following materials  
24 submitted by the parties:

- 25 1. Plaintiff's Second Motion to Compel Discovery Requests to Mozilla Corporation  
26 and Individual Defendants;
- 27 2. Declaration of Mathew Herrington In Support of Plaintiff's Motion to Compel,  
28 with exhibits;

29 [PROPOSED] ORDER GRANTING PLAINTIFF'S SECOND  
30 MOTION TO COMPEL - 1  
31 60606-003

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1       3. Defendants Mozilla Corporation a.k.a.M.F. Technologies, Laura Chambers, and  
 2 Dani Chehak's Response in Opposition to Plaintiff's Second Motion to Compel Discovery  
 3 Requests to Mozilla Corporation and Individual Defendants;

4       4. Reply to Plaintiff's Second Motion to Compel Discovery Requests to Mozilla  
 5 Corporation and Individual Defendants;

6       5. Declaration of Maricarmen C. Perez-Vargas In Support of Reply to Plaintiff's  
 7 Second Motion to Compel Discovery Requests to Mozilla Corporation and Individual  
 8 Defendants, with exhibits.

9              The Court having reviewed the files and records herein, and being fully advised, **NOW**  
 10 **THEREFORE**,

11       1. Mozilla Corporation is compelled to disclose information about other employees  
 12 who separated from Mozilla Corporation after taking leaves of absence (like Plaintiff) (ROG 8)  
 13 and/or after Requesting Disability Accommodation (like Plaintiff) (ROG 9), as this information  
 14 is requested in Interrogatories 8-10 to Mozilla Corporation. Mozilla Corporation must produce  
 15 this information within 14 days.

16              GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

17       2. Mozilla Corporation is compelled to disclose information about internal  
 18 discrimination complaints for which Mozilla Corporation's process identified in response to  
 19 Interrogatory No. 11 was not followed. This information is requested in Interrogatory No. 12.  
 20 Mozilla Corporation must produce this information within 14 days.

21              GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

22       3. Mozilla Corporation is compelled to produce performance evaluations for  
 23 Mitchell Baker and members of the Executive Steering Committee as requested in Request for  
 24

1 Production No. 11 to Mozilla Corporation. Mozilla Corporation must produce this information  
2 within 14 days.

3 GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

4 4. Mozilla Corporation is compelled to produce information regarding complaints or  
5 reports made to Mozilla Corporation's Human Resources department regarding mistreatment or  
6 discrimination based on disability, in response to Request for Production No. 21. Mozilla  
7 Corporation must produce this information within 14 days.

8 GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

9 5. Defendants Mozilla Corporation, Chambers, and Chehak are compelled to  
10 disclose summaries, follow up, communications, and other requested information about the TK  
11 Law assessment of Mozilla Corporation's cultural competence, i.e., its discriminatory practices,  
12 as this information is requested in Requests for Production 26 and 27 to Mozilla Corporation and  
13 Request for Production 2 to Chambers and Chehak. Mozilla Corporation, Chambers, and Chehak  
14 must produce this information within 14 days.

15 GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

16  
17 DATED \_\_\_\_\_, 2025

18  
19 THE HONORABLE RICHARD A. JONES

1 Presented by:

2 STOKES LAWRENCE, P.S.

3 By: /s/Maricarmen Perez-Vargas

4 Amy Alexander (WSBA #44242)

5 Mathew Harrington (WSBA #33276)

6 Maricarmen Perez-Vargas (WSBA # 54344)

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14 Attorneys for Plaintiff Steve Teixeira

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[PROPOSED] ORDER GRANTING PLAINTIFF'S SECOND  
MOTION TO COMPEL - 4  
60606-003

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